

UNITED STATES DISTRICT COURT

for the
Northern District of Illinois

Eastern Division

Adrian Rangel

1:19-cv-07020

Judge Manish S. Shah

Magistrate Judge Sidney I. Schenkier

Plaintiff(s)

(Write the full name of each plaintiff who is filing this complaint. If the names of all the plaintiffs cannot fit in the space above, please write "see attached" in the space and attach an additional page with the full list of names.)

-v-

Twitter Foundation
Vijaya Gadde

Defendant(s)

(Write the full name of each defendant who is being sued. If the names of all the defendants cannot fit in the space above, please write "see attached" in the space and attach an additional page with the full list of names.)

Jury Trial: (check one) ☒ Yes ☐ No

FILED

OCT 24 2019

THOMAS G. BRUTON
CLERK, U.S. DISTRICT COURT

COMPLAINT FOR A CIVIL CASE

I. The Parties to This Complaint

A. The Plaintiff(s)

Provide the information below for each plaintiff named in the complaint. Attach additional pages if needed.

Name	Adrian Rangel
Street Address	P.O. Box 1191
City and County	Lake Zurich (Lake County)
State and Zip Code	Illinois 60047
Telephone Number	312-696-9889
E-mail Address	adriangrangel@yahoo.com

B. The Defendant(s)

Provide the information below for each defendant named in the complaint, whether the defendant is an individual, a government agency, an organization, or a corporation. For an individual defendant, include the person's job or title (if known). Attach additional pages if needed.

Defendant No. 1

Name	Vijaya Gadde
Job or Title <i>(if known)</i>	Chief Executive Officer
Street Address	1355 Market St., Ste 900
City and County	San Francisco (San Mateo County)
State and Zip Code	CA 94103
Telephone Number	415-222-9670
E-mail Address <i>(if known)</i>	

Defendant No. 2

Name	Twitter Foundation
Job or Title <i>(if known)</i>	
Street Address	1355 Market St., Ste. 900
City and County	San Francisco (San Mateo County)
State and Zip Code	CA 94103
Telephone Number	415-222-9670
E-mail Address <i>(if known)</i>	

Defendant No. 3

Name	
Job or Title <i>(if known)</i>	
Street Address	
City and County	
State and Zip Code	
Telephone Number	
E-mail Address <i>(if known)</i>	

Defendant No. 4

Name	
Job or Title <i>(if known)</i>	
Street Address	
City and County	
State and Zip Code	
Telephone Number	
E-mail Address <i>(if known)</i>	

II. Basis for Jurisdiction

Federal courts are courts of limited jurisdiction (limited power). Generally, only two types of cases can be heard in federal court: cases involving a federal question and cases involving diversity of citizenship of the parties. Under 28 U.S.C. § 1331, a case arising under the United States Constitution or federal laws or treaties is a federal question case. Under 28 U.S.C. § 1332, a case in which a citizen of one State sues a citizen of another State or nation and the amount at stake is more than \$75,000 is a diversity of citizenship case. In a diversity of citizenship case, no defendant may be a citizen of the same State as any plaintiff.

What is the basis for federal court jurisdiction? *(check all that apply)*

☐ Federal question ☒ Diversity of citizenship

Fill out the paragraphs in this section that apply to this case.

A. If the Basis for Jurisdiction Is a Federal Question

List the specific federal statutes, federal treaties, and/or provisions of the United States Constitution that are at issue in this case.

B. If the Basis for Jurisdiction Is Diversity of Citizenship**1. The Plaintiff(s)****a. If the plaintiff is an individual**

The plaintiff, *(name)* Adrian Rangel, is a citizen of the
State of *(name)* Illinois.

b. If the plaintiff is a corporation

The plaintiff, *(name)* _____, is incorporated
under the laws of the State of *(name)* _____,
and has its principal place of business in the State of *(name)* _____.

(If more than one plaintiff is named in the complaint, attach an additional page providing the same information for each additional plaintiff.)

2. The Defendant(s)**a. If the defendant is an individual**

The defendant, *(name)* Vijaya Gadde, is a citizen of
the State of *(name)* California. Or is a citizen of
(foreign nation) _____.

V. Certification and Closing

Under Federal Rule of Civil Procedure 11, by signing below, I certify to the best of my knowledge, information, and belief that this complaint: (1) is not being presented for an improper purpose, such as to harass, cause unnecessary delay, or needlessly increase the cost of litigation; (2) is supported by existing law or by a nonfrivolous argument for extending, modifying, or reversing existing law; (3) the factual contentions have evidentiary support or, if specifically so identified, will likely have evidentiary support after a reasonable opportunity for further investigation or discovery; and (4) the complaint otherwise complies with the requirements of Rule 11.

A. For Parties Without an Attorney

I agree to provide the Clerk's Office with any changes to my address where case-related papers may be served. I understand that my failure to keep a current address on file with the Clerk's Office may result in the dismissal of my case.

Date of signing: 16-24-2019

Signature of Plaintiff

Printed Name of Plaintiff


Adrian Rangel, PRO SE

B. For Attorneys

Date of signing: _____

Signature of Attorney

Printed Name of Attorney

Bar Number

Name of Law Firm

Street Address

State and Zip Code

Telephone Number

E-mail Address

b. If the defendant is a corporation

The defendant, (name) Twitter Foundation, is incorporated under the laws of the State of (name) California, and has its principal place of business in the State of (name) California.
Or is incorporated under the laws of (foreign nation) _____, and has its principal place of business in (name) _____.

(If more than one defendant is named in the complaint, attach an additional page providing the same information for each additional defendant.)

3. The Amount in Controversy

The amount in controversy—the amount the plaintiff claims the defendant owes or the amount at stake—is more than \$75,000, not counting interest and costs of court, because (explain):
\$1,000,000,000.00 (One Billion Dollars) for violation of Adrian Rangel's constitutional rights as outlined in both Section III Statement of Claim and in Section IV Relief of this document.

III. Statement of Claim

Write a short and plain statement of the claim. Do not make legal arguments. State as briefly as possible the facts showing that each plaintiff is entitled to the damages or other relief sought. State how each defendant was involved and what each defendant did that caused the plaintiff harm or violated the plaintiff's rights, including the dates and places of that involvement or conduct. If more than one claim is asserted, number each claim and write a short and plain statement of each claim in a separate paragraph. Attach additional pages if needed.

The case involves an incident which took place on September 7, 2019 online via Twitter (Twitter Foundation), a cyber gathering, where United States citizens gather to exchange ideas both freely and candidly. The ideas and comments range in topic from the mundane to the comical, Quite frequently the topics turn to state, local and federal topics.

(continued on attached 6 page separate sheet Titled Statement of Claim continuation in entirety)

IV. Relief

State briefly and precisely what damages or other relief the plaintiff asks the court to order. Do not make legal arguments. Include any basis for claiming that the wrongs alleged are continuing at the present time. Include the amounts of any actual damages claimed for the acts alleged and the basis for these amounts. Include any punitive or exemplary damages claimed, the amounts, and the reasons you claim you are entitled to actual or punitive money damages.

Plaintiff contends that Twitter Foundation and Vijaya Gadde violated Adrian Rangel's constitutional rights to freedom of speech, freedom of expression, freedom of religion, freedom of assembly, freedom from unlawful seizure, due process, substantive due process and equal protection rights of the United States Constitution. For the above violations of Plaintiff Adrian Rangel's constitutional rights by the Defendants Twitter Foundation and Vijaya Gadd (both officially and unofficially), Plaintiff is asking this Court to award, jointly and or severally, the Plaintiff \$100,000,000.00 compensatory and \$900,000,000.00 in exemplary damages for the above violations of Adrian Rangel's constitutional rights and for intentional and negligent infliction of emotional distress upon the Plaintiff.

Statement of Claim (continuation in entirety)

This case involves an incident which took place on September 7, 2019 via online Twitter (Twitter Foundation), a cyber gathering, where United States citizens and others come together to exchange ideas both freely and candidly. The ideas and comments exchanged range in topics from the mundane to the comical. Quite frequently, the topics turn to state, local and federal governmental concerns.

Because the topics often touch on matters of serious concern regarding taxpayer money, the rhetoric can occasionally get fiery. At other times the topics touch on ideas affecting United States citizens' way of life and the direction of United States domestic policy.

The comment " HANG THEM ALL " by the Plaintiff prompted Defendants Twitter Foundation and Vijaya Gadde to suspend Adrian Rangel's Twitter account - religiouserpico. Plaintiff contends that by suspending Plaintiff's account religiouserpico Defendants Twitter Foundation and Vijaya Gadde violated Adrian Rangel's constitutional rights to (1) freedom of speech, (2) freedom of expression, (3) freedom of religion, (4) freedom of assembly, (5) freedom against unlawful seizure, (6) due process, (7) substantive due process and (8) equal protection of the United States Constitution:

I. Freedom of Speech

Responding to another Twitter post, Plaintiff posted or tweeted “ HANG THEM ALL” whereupon Twitter immediately suspended Adrian Rangel’s Twitter account named - religiouserpico. Adrian Rangel contends that his response “ HANG THEM ALL” was rhetorical, vague and deliberately ambiguous as to the “ them “ he had referenced in the phrase “ HANG THEM ALL” . In addition, Plaintiff contends that his “ HANG THEM ALL” response / tweet produced no action, was not imminent, nor was likely to occur. It is important to note that the Plaintiff is not a member of any extremist group. As such, Plaintiff contends that Twitter Foundation and Vijaya Gadde violated his constitutional rights to Freedom of Speech by immediately suspending his Twitter religiouserpico account for Plaintiff’s tweet of “ HANG THEM ALL” .

II. Freedom of Expression

Similarly, Plaintiff contends that his post / tweet “ HANG THEM ALL” was *rhetorical* , very Chicagoan in vernacular, vague and deliberately ambiguous as to the “ them “ Plaintiff referenced. Again, Plaintiff contends that his “ HANG THEM ALL” tweet produced no action, was not imminent, nor was likely to occur. As such, Plaintiff contends that Defendants Twitter Foundation and Vijaya Gadde violated his constitutional rights to Freedom of Expression by immediately suspending his Twitter religiouserpico account for Plaintiff’s use of the expression “ HANG THEM ALL” .

III. Freedom of Religion

Before the Defendants suspended Plaintiff's account, Plaintiff used Twitter to proclaim his religious beliefs to the public of being a Born Again King James Bible Only Christian. Plaintiff included the being Born Again King James Bible Only Christian in his Twitter profile. In addition, Plaintiff followed and was followed by a number of people on Twitter - one group being people of like-minded religious beliefs. Tangentially, Plaintiff contends that President Donald J Trump was *nothing short of miraculously* elected by God into the Presidency; most specifically because of Donald Trump's victory in light of the tremendous media, political and social resistance to his election to the Presidency of the United States. Plaintiff used Twitter to support what Plaintiff contends is Donald J Trump's *nothing short of miraculous* election to the Presidency. As such, Plaintiff's religious beliefs are intertwined with Plaintiff's support of Donald J Trump as President of the United States of America. Plaintiff contends that Defendants Twitter Foundation and Vijaya Gadde violated Plaintiff's constitutional rights to Freedom of Religion by immediately suspending his Twitter religiouserpico account for Plaintiff's use of the phrase "HANG THEM ALL".

IV. Freedom of Assembly

Plaintiff contends that Twitter / Twitter Foundation have evolved past a mere online presence to comprise groupings of like-minded individuals who exchange a myriad of thoughts and expressions from the mundane to the

comical to the social to the political to the economic to the religious to the global etc. Because Plaintiff used Twitter to communicate exchanges with individuals of like-minded religious and political beliefs, Plaintiff contends that Defendants Twitter Foundation and Vijaya Gadde violated his constitutional - rights to Freedom of Assembly by suspending Plaintiff's religiouserpico account for Plaintiff's use of the phrase "HANG THEM ALL".

V. Freedom against unlawful seizure

Plaintiff used Twitter to express and propose his religious, political, social and moral beliefs etc to influence America to his way of thinking. As such, Plaintiff used Twitter to memorialize, catalogue and save many of his thoughts, ideas and philosophies. Plaintiff contends that by suspending his religiouserpico account Defendants Twitter Foundation and Vijaya Gadde constructively seized Plaintiff's online records to his tweets or Twitter communications in suspending and denying access to Plaintiff to his Twitter records / communications. In so doing, Plaintiff contends that Twitter violated Plaintiff's constitutional rights against unlawful seizure – specifically Plaintiff's online Twitter tweets.

VI. Due Process Violations

Plaintiff contends that Defendants Twitter Foundation and Vijaya Gadde violated his constitutional due process rights in that Twitter immediately suspended Plaintiff's religiouserpico account before holding or giving the Plaintiff any kind of hearing. Twitter's Appeal process resulted in a denial of

Plaintiff's Appeal with little or no explanation by Defendants Twitter Foundation and Vijaya Gadde for the continued suspension of Plaintiff's religiouserpico Twitter account.

VII. Substantive Due Process Violations

Plaintiff contends that Defendants Twitter Foundation and Vijaya Gadde violated his constitutional substantive due process rights because Twitter immediately suspended Plaintiff's religiouserpico account before holding or giving the Plaintiff any kind of hearing. *Even Twitter's Appeal process resulted in a denial of Plaintiff's Appeal with little or no explanation by Defendants* Twitter Foundation and Vijaya Gadde for the continued suspension of Plaintiff's religiouserpico account.

VIII. Equal Protection Violation

Plaintiff contends that Twitter Foundation, a California Nonprofit Corporation, and Twitter CEO Vijaya Gadde, a California citizen are both inside of United States legal jurisdiction and as such subject to the laws of the United States Constitution. Plaintiff further contends that Defendants Twitter Foundation and Vijaya Gadde have illegally embarked upon an illegal circumvention of the United States Constitution in attempting to impose on United States citizens the legal cultures of foreign countries i.e. India, China, Russia, Germany, United Kingdom etc. Many of these foreign countries were once or still are considered third world countries because of their former or present totalitarian subjugation or colonizing regimes. As such, Plaintiff contends that Plaintiff's

rights to equal protection by the laws of the United States Constitution have been violated by Defendants Twitter Foundation and Vijaya Gadde's misguided application of a global and European Union type legal culture / philosophy in addressing United States citizens - in this specific case upon the Plaintiff for Plaintiff's use of the phrase "HANG THEM ALL".

Relief Sought

For the above violations of Plaintiff Adrian Rangel's constitutional rights by the Defendants Twitter Foundation and Vijaya Gadde (in both her official and unofficial capacity), Plaintiff is asking this Court to award the Plaintiff both jointly and or severally \$100,000,000.00 compensatory and \$900,000,000.00 exemplary in damages for the above violations of Plaintiff Adrian Rangel's constitutional rights and for intentional and negligent infliction of emotional distress upon the Plaintiff for Plaintiff's use of the phrase "HANG THEM ALL".

Dated 10-24-2016

Signed  PRO SE

Printed: Adrian Rangel

POB 1191

Lake Zurich, IL 60047

312-696-9889